

ESTTA Tracking number: **ESTTA753791**

Filing date: **06/21/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|---------------------------|---|
| Proceeding | 92063694 |
| Party | Defendant K. Hansotia & Co., Inc. |
| Correspondence Address | K HANSOTIA & CO INC 6600 HIATUS ROAD TAMARAC, FL 33321 UNITED STATES |
| Submission | Answer |
| Filer's Name | Pablo Meles |
| Filer's e-mail | pmeles@bellsouth.net |
| Signature | /pablo meles/ |
| Date | 06/21/2016 |
| Attachments | Answer_BLACKDRAGON_Cancellation.pdf(120645 bytes) |

11. Without knowledge therefore denied.
12. Without knowledge therefore denied.
13. Without knowledge therefore denied.
14. Without knowledge therefore denied.

AFFIRMATIVE DEFENSES

First Affirmative Defense

(Failure to State A Claim)

15. Petition has failed to state a claim upon which relief can be granted.

Second Affirmative Defense

(Laches)

16. Petitioner's claims for relief are barred, in whole or in part, by the doctrine of laches.

Third Affirmative Defense

(Estoppel)

17. Petitioner's claims for relief are barred, in whole or in part, by the doctrine of estoppel.

Fourth Affirmative Defense

(Unclean Hands)

18. Petitioner's claims are barred, in whole or in part, by the doctrine of unclean hands.

Dated: June 21, 2016

Respectfully submitted,

/pablo meles/-----
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Attorneys for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on this 21nd Day of June 2016, I electronically filed the foregoing with the Trademark Trial and Appeal Board system which will send a notice of electronic filing to counsel of record. I further certify that a copy of the foregoing was sent via First Class Mail to counsel for Petitioner, to:

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